State of North Carolina
Department of Environment,
Health and Natural Resources
Winston-Salem Regional Office

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
Leesha Fuller, Regional Manager

DEHNR
DIVISION OF ENVIRONMENTAL MANAGEMENT
GROUNDWATER SECTION

NOTICE OF VIOLATION OF SUBCHAPTER 2N CRITERIA AND STANDARDS APPLICABLE TO UNDERGROUND STORAGE TANKS

August 13, 1993

CERTIFIED MAIL NUMBER P-536 304 183
RETURN RECEIPT REQUESTED

CT Corporation System, Registered Agent
Crown Central Petroleum Corporation
225 Hillsborough Street
Raleigh, NC 28603

SUBJECT LOCATION: **Crown Station NC-16, 1600 Randleman Road, Greensboro, Guilford County**
Facility #: 0-010259

Dear Sirs:

On July 30, 1993, an inspection of the Underground Storage Tank (UST) operation at the subject location was performed by Richard Sieg of the Division. Mr. Sieg observed that USTs at the subject location are not in compliance with 15A NCAC 2N, "Criteria and Standards Applicable to Underground Storage Tanks." All references to parts of the federal regulations 40 CFR 280, "Underground Storage Tanks; Technical Requirements," were adopted by 15A NCAC 2N.

The following notes may be necessary for reference:

1. See the attached inspection sheets for reference to tank numbers at the subject facility.

2. In accordance with 2N, all tanks and piping at this facility are required to be in compliance with the leak detection regulations.

3. All information recorded on the attached inspection forms were based on information provided by Mr. Michael S. Lintner, Mr. David S. Shewbridge, Mr. Dwight Kirby and Mr. Sammy Lawson; each was present for all or part of the inspection.

4. Mr. Sieg noted that vapor monitoring wells were present on site. One vapor well was checked for water and that well contained more than one foot of water. If these wells have been used for the detection of vapors, it is recommended that you review 280.43(e). Groundwater is known to render vapor detection devices inoperative.

The following violations of 2N were observed:

Violation 1:
Failure to provide leak detection for three tanks in accordance with 40 CFR 280.41 as adopted by 2N .0501.

CORRECTIVE ACTION for Violation 2: (Each corrective action must be completed before the violation can be deemed corrected)

1. According to Mr. Lintner, the chosen method of leak detection for this facility is automatic tank gauging. Records of the monthly 0.2 gallon per hour leak rate tests were not available for a nine month period, October, 1992, through June, 1993. Therefore, submit copies of the next two months of tests to Mr. Sieg at the address below. It was observed during the inspection that the Red Jacket RLM-9000 is employed to meet requirements for automatic tank gauging.

2. Failed to conduct inventory control in accordance with the requirements of 280.43(a) as adopted by 2N .0504. No records showing the monthly comparison of actual monthly overage/shortage values to allowable overage/shortage values were available. Compute the monthly overage/shortage, and reconcile a monthly overage/shortage for the months of July, 1992, through June, 1993. Forward this information to Mr. Sieg at the address below.

   Note: 2N .0504 states "product inventory control (or another test of equivalent performance) must be conducted monthly to detect a release of at least 1.0 percent of flow-through plus 130 gallons on a monthly basis...." For more information on inventory control requirements contact Mr. Sieg at the number below.

Violation 2:
Failure to notify DEM of compliance with leak detection requirements as required by 2N .0405.

CORRECTIVE ACTION for Violation 2:
Complete the enclosed GW/UST-8 form, "Notification For All USTs [New & Upgraded]," and forward the completed form to Mr. Sieg at the address below.

A report concerning these violations will be forwarded to the Division of Environmental Management Staff in Raleigh. The report will conclude with a recommendation by this Office that appropriate enforcement action be taken by the Director in accordance with North Carolina General Statutes 143-215.6. You will be advised if enforcement action is taken.

Submit in writing within thirty (30) days after receipt of this notice, a report indicating that proper corrective action has been completed. Include corrective action in a report, and submit the report to:

Richard Sieg
NCDEHNR-Groundwater Section
8025 North Point Blvd., Suite 100
Winston-Salem, NC 27106

Failure to comply with any of the aforementioned criteria and standards may result in further enforcement action against you which may include: (1) a civil penalty assessment of up to $10,000 per violation for each day of continuing violation (NC G.S. 143-215.6A), (2) criminal penalty proceedings under circumstances as outlined under G.S. 143-215.6B, (3) referral of your site to the Federal Trust Fund which must seek cost recovery from responsible parties for any and all expenses incurred, (4) a request to the Attorney General to institute an action for injunctive relief and, (5) the issuance of a special order.

It is your responsibility to comply with these criteria and standards. Copies of 15A NCAC 2N are available at this office.

Should you have any questions, please contact Mr. Richard Sieg or Mrs. Sherri Knight at (919) 896-7007.

Sincerely,

Larry D. Coble

Larry D. Coble
Regional Supervisor

LC:SK:RLS:rls

cc: Office of Attorney General
Pollution Control Branch - Annette Parker
Mitchell Bowyer - UST Compliance Group
Guilford County Health Department
Guilford County Fire Marshall
Guilford County Department of Emergency Services
WSRO Files
Jack Bright - Crown, Baltimore Office
Mike Lintner - Crown, Richmond Office

Inspection Date	**UST General Requirements Inspection Checklist**	Facility ID#

I. Ownership of Tank(s)

MR. CROWN CENTRAL PETROLEUM
Owner's Name (Corporation, Individual, Public Agency, or other entity)

4401 E. MAIN ST
Street Address

RICHMOND VA 23231
City State Zip Code

Area Code Phone Number
MIKE LANTNER 804-226-0600
Contact Person for UST Location Phone #

II. Location of Tank(s) (If same as Section I, list county _____)

CROWN NC-16
Facility Name or Company Site identifer, as applicable

1600 RANDLEMAN RD
Street Address

GU GREENSBORO 27405
County City (nearest) Zip Code
3

Number of Tanks at This Location:

DWIGHT KIRBY 919-272-8771
Operator Name Facility Phone #

Comments:

III. UST Information (Please complete all information for each tank. If this facility has more than 6 tanks, please photocopy this page and complete the information for all additional tanks.)

	Tank # 1	Tank # 2	Tank # 3	Tank #	Tank #	Tank#
Tank presently in use	C	C	C			
If not, date last operated						
If emptied, verify 1" or less of product in tank						
Month and Year Tank Installed	6/74	6/78	6/74			
Material of Constuction (Tanks) UPGRADE 12-15-89	SE	SE	SE			
Material of Construction (Piping)	FRP	FRP	FRP			
Capacity of Tank (In Gallons)	15K	10K	15K			
Substance Stored (G-Gasoline, D-Diesel, K-Kerosene, H- Heating Oil, O-Other, UK-Unknown)	G REG	G PLUS	G PRE			

Comments:

IV. (A) Leak Detection For Tanks (Check the leak detection method(s) used for each tank or N/A if none required)

Manual Tank Gauging (See Regulatory Limitations)						
Tank Tightness Testing & Inventory Control						
Automatic Tank Gauging	✓	✓	✓			
Vapor Monitoring						
Groundwater Monitoring						
Interstitial Monitoring						
Statistical Inventory Reconciliation						
Other approved method (write in name of method)						
None						

IV. (B) Leak Detection For Piping (Check the leak detection method(s) used for piping)

Pressurized/Suction Piping (P or S)	P	P	P			
Vapor Monitoring						
Groundwater Monitoring						
Secondary Containment with Monitoring						
Automatic Line Leak Detectors	✓	✓	✓			
Line Tightness Testing						
Other approved method (write in name of method)						
None						

Comments:

-Continued on reverse-

V. Spill and Overfill Prevention Equipment

SPILL Prevention (Type): OPW - ~~6150 SERIES~~ 1-4000

OVERFILL Prevention (Type): OPW-6150 SERIES

[✓] 95% Shutoff [ ] 90% Flow restrictor [ ] 90% Alarm

[ ] 30 min. Flow Rest. [ ] 1 min. alarm [ ] Top auto shutoff

Comments:

VI. (A) Interior Lining

	Tank#	Tank#	Tank#	Tank#	Tank#	Tank#
Repairs by industry codes; and						
Tank Tightness Test within 30 days; or						
Internal Inspection; or						
Leak detection for repaired portion; or						
Other equivalent method						
Internal inspection within 10 years and every 5 years following.						

Comments:

VI. (B) Cathodic Protection IMPRESSED CURRENT - HARCO TECH. CORP. 404-981-3150

Test location for tanks:

Test location for piping:

Test location for flex connectors:

Field installed by corrosion expert:

Coated w/suitable dielectric material:

Corrosion maintenance records available:

Comments: NO BIMONTHLY RECORDS POST INSTALLATION REPORT

VII. UST Forms Submitted

Comments: NOTIFICATION FOR USTS

NO UST-B, 7, ~~8~~, ETC

NO UST FORMS AVAIL.

VIII. Site Information

For USTs installed after January 1, 1991; answer yes, no, or N/A:

1. [N/A] Tanks less than 100' from water system well
2. [N/A] Tanks less than 50' from public well supplying water for human consumption
3. [N/A] Tanks between 100' and 500' from public water system wells (Secondary Containment Required)
4. [N/A] Tanks between 50' and 100' of well supplying water for human consumption (Secondary Containment Required)
5. [ ] Site Diagram maintained on-site

Type of Inspection: REFERRAL Date of last Inspection:

Date Inspection Completed: 7/30/93 Name of Inspector: R. SIEG

Comments:

I, DAVID S. SHEWBRIDGE, certify that all the information given to: RICHARD SIEG on 7/30/93

print name of owner or owner's representative — inspector's name — month, day, year

is true and accurate to the best of my belief. Signature: David S. Shewbridge

Automatic Tank Gauging

Facility ID#

Manufacturer, name and model number of system: RED JACKET RLM-9000

Third-party evaluators: NOT AVAIL

Please answer yes or no for each question.

Device documentation is available at site (e.g., manufacturer's brochures, owners manual).	yes ✓	no
Device can measure height of product to nearest one-eighth of an inch.	yes ✓	no
Documentation shows that water in bottom of tank is checked monthly to nearest one-eighth of an inch.	yes ✓	no
Owner/operator has documentation on file verifying method meets minimum performance standards of .20 gph with Pd 95% and Pfa of 5% for automatic tank gauging (e.g., results sheets under EPA's "Standard Test Procedures for Evaluating Leak Detection Methods").	yes	no ✓
Records of monthly .20 gph leak rate tests are available for the past 12 months.	yes	no ✓
Checked for presence of monitoring box and evidence that device is working.	yes ✓	no
Checked for presence of gauge in tanks.	yes ✓	no
Dispenser pumps have current calibration stickers.	yes ✓	no

Inventory Control. Please answer yes or no for each question.

Inventory measurements are recorded daily.	yes ✓	no
Inventory measurements are reconciled monthly.	yes *	no
Reconciliation records are available for the past 12 months.	yes ✓	no

Comments:

	1	2	3
9-15-92	P	P	P
8-3-92	P	P	P
7-12-92	P	P	P
6-22(2)(17)-92	P	P	P
5-4(12)-92	P	P	P

7/29/93 .1 GAL/HR TEST

10K FAILED -.12

15K PASSED .15

15K PASSED -.02

* NO MONTHLY COMPARISON W/ 1% + 130 GALLONS

	REG	PLUS	PRE
6/93	410	843	228
5/93	-168	137	-9
4/93	229	-35	-16
3/93	-170	42	105

WAYNE DECADE

2400

C

Leak Detection for Piping

Facility ID#

Manufacturer and name of system: RED JACKET RLM-9000

Third-party evaluators: NOT AVAILABLE

Pressurized Piping. A method must be selected from each set. Where applicable indicate date of last test.

Set 1	Tank # 1	Tank # 2	Tank # 3	Tank #	Tank #	Tank #
Automatic Flow Restrictor						
Automatic Shut-off Device	✓	✓	✓			
Continuous Alarm System						
and						
Set 2						
Annual Line Tightness Testing						
Vapor Monitoring						
Interstitial Monitoring						
Groundwater Monitoring						
Other Approved Method (specify in comments section)	?	?	?			

Suction Piping Indicate date of most recent test

Line Tightness Test (required every 3 years)						
Vapor Monitoring						
Secondary Containment w/Interstitial Monitoring						
Groundwater Monitoring						
Other Approved Method (specify in comments section)						
No Leak Detection Required (must answer yes to all the following questions)						
Operates at less than atmoshere pressure						
Has only one check valve, which is located directly under pump						
Slope of piping allows product to drain back into tank when suction released						
All above information on suction piping is verifiable						
Records maintained in accordance with 2N .0506						
No records available						

Comments: (Sketch of site with piping runs, tanks, & approximate distances)

Inventory Control and Tank Tightness Testing

Facility ID#

Manufacturer of Tank Tightness Testing (TTT) system: _____

Name and model of TTT: _____

Name and address of TTT tester: _____

_____

Third Party Certification Evaluaters: _____

Please complete all information for each tank.

	Tank #	Tank #	Tank #	Tank #	Tank #	Tank #
Date of last tank tightness test.						
Did tank pass test ? Indicate yes or no.						
Documentation of deliveries and sales balances with daily measurements of liquid volume in tank are maintained and available.						
Overages or shortages are less than 1% + 130 gals of tank's flow through volume.						
If no, which months were not ?						

Please check yes or no for each question.

1. Owner/operator can explain inventory control methods and figures used and recorded.	yes	no
2. Records include monthly water monitoring.	yes	no
3. Books appear used and evidence of recent entries is apparent.	yes	no
4. Appropriate calibration chart is used for calculating volume.	yes	no
5. Books are reconciled monthly.	yes	no
6. The ends of the gauge stick are flat and not worn down.	yes	no
7. The dipstick is marked legibly and the product level can be determined to the nearest one-eighth of an inch.	yes	no
8. Owner can demonstrate consistency in dipsticking techniques.	yes	no
9. The dipstick is long enough to reach the bottom of the tank.	yes	no
10. The tanks have been tested within the year (or 5 years if appropriate) and have passed the TTT.	yes	no
11. A third-party certification of the tank tightness test method is available.	yes	no
12. Tank tester complied with all certification requirements.	yes	no
13. Records available in accordance with 2N .0506	yes	no
14. Dispenser pumps have current calibration stickers.	yes	no

Comments: